## REMARKS

Upon entry of the instant Amendment, claims 1-29 will be pending in the application. Claims 1, 22, 24 and 25 are independent. By this amendment, claims 1 and 21-25 will have been amended and claims 26-29 will have been added. Support for the claim amendments can be found in at least page 19, lines 19-21. No new matter is added. Reconsideration of the rejections in view of the above amendments and the following remarks is respectfully requested.

### *Allowable Claims*

Claim 17 was indicated to contain allowable subject matter and would be allowable is presented in independent form. However, Applicants are not presenting this claim in independent form at this time because it is believed that the claims from which claim 17 depends are allowable over the applied art of record.

### *Objection to the Drawings*

The drawings were objected to because they are asserted to be informal and contain handwriting. Applicants are, by the instant Amendment, submitting formal drawings in order to address this objection.

Accordingly, Applicants respectfully submit that the objection to the drawings is now moot and should be withdrawn.

### *Objection to the Specification*

The specification was objected to because the terms "CABProcessing" and "ABL" are not defined in the specification. Applicants are, by the instant Amendment, amending the specification to provide the requested definitions or meanings of these terms.

For the record, the term CABProcessing is known in the art to stand for Candidate Address Block which refers to an area of an image that may contain an address. An address may be hand written or machine printed and generally contains several lines of text with information such as, e.g., city, state, zip, street number, street name, addressee name, etc. The term ABL is known in the art to stand for Address Block Location which refers to a process that examines an image of a mail piece and produces a list of CABs.

Accordingly, Applicants respectfully submit that the objection to the specification is now moot and should be withdrawn.

### *Objection to the Claims*

Claim 25 was objected to because the preamble is asserted to not properly correspond to the body of the claim which relates to method steps. Applicants are, by the instant Amendment, amending claim 25 in an effort to address this basis of objection.

Accordingly, Applicants respectfully submit that the objection to the claims is now moot and should be withdrawn.

### 35 U.S.C. § 101 Rejection

Claims 1-23 were rejected under 35 U.S.C. § 101 for being allegedly directed to non-statutory subject matter.

While Applicants disagree that the above-noted claims merely relate to data manipulation and do not recite a tangible structural feature (i.e., they recite a common framework), Applicants are, in an effort to address this basis of rejection, nevertheless amending claims 1 and 22 to recite, among other things, that the method is implemented on hardware.

Accordingly, Applicants respectfully submit that the rejection of the above-noted claims is now moot and should be withdrawn.

### 35 U.S.C. § 112 Rejection

Claim 23 was rejected under 35 U.S.C. § 112, second paragraph, for being allegedly indefinite.

Applicants are, in an effort to address this basis of rejection, herein amending claim 23 to clarify the language asserted by the Examiner to "not make sense."

Accordingly, Applicants respectfully submit that the rejection of the above-noted claims is now moot and should be withdrawn.

### 35 U.S.C. § 102 Rejection

Claims 1-9, 11-13, 15, 16 and 22-25 were rejected under 35 U.S.C. § 102(b) for being allegedly anticipated by U.S. Patent No. 6,104,405 to IDASZAK et al.

In order to establish a *prima facie* case of anticipation under 35 U.S.C. § 102, a single prior art reference must disclose each and every element as set forth in the subject claim.  *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987).  Applicants respectfully submit that a *prima facie* case of anticipation cannot be established because IDASZAK fails to teach each and every element of the claims.

More particularly, independent claim 1 recites, *inter alia,*

providing to the hardware a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape;
defining with the hardware the first geometric shape by one or more coordinates; and
converting with the hardware the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions.

Additionally, independent claim 22 recites, *inter alia,*

filling a handle with an initial area of interest (AOI) space associated with a first set of instructions using the hardware;
defining a geometric shape associated with the initial AOI using the hardware;
converting the initial AOI space to a second AOI space associated with a second set of instructions using the hardware; and
accessing the second AOI space with the second set of instructions.

Furthermore, independent claim 24 recites, *inter alia,*

means for providing a first set of instructions which generate an area of information (AOI) and which is defined by a first geometric shape;
means for defining the first geometric shape by one or more coordinates; and
means for converting the one or more coordinates associated with the first geometric shape to a second set of coordinates for use with a second set of instructions.

Finally, independent claim 25 recites, *inter alia,*

providing a first set of instructions which generate an area of information (AOI) and which is defined by a first geometric shape;

defining the first geometric shape by one or more coordinates; and

converting the one or more coordinates associated with the first geometric shape to a second set of coordinates for use with a second set of instructions.

Applicants submit that IDASZAK does not disclose or even suggest any one or more of these features. Applicants acknowledge, for example, that IDASZAK teaches a system and method for converting image data into nonplanar image data for displaying on a nonplanar display (see abstract). Applicants also acknowledge that IDASZAK discloses that the image data is used to produce transformed image data, subjecting the transformed image data to distortion correction to produce nonplanar image data, processing the transformed image data on a planar image graphics computer system, and displaying the processed planar image on a nonplanar display (see abstract). However, Applicants respectfully submit that, contrary to the instant invention, IDASZAK does not disclose at least the above-noted features of claims 1, 22, 24 and 25.

Applicants note, for example, that IDASZAK is entirely silent with regard to providing a first set of instructions which generates an area of interest or information (AOI) defined by a first geometric shape (claims 1 and 25). Applicants note that the disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of providing a first set of instructions which generates an area of interest or information (AOI) defined by a first geometric shape. The system in IDASZAK merely converts previously prepared image data into nonplanar image data. Nor can it be said that the nonplanar image produced by the disclosed conversion step constitutes generating an area of interest (AOI)

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defined by a first geometric shape. The Examiner has failed to explain the equivalency between a nonplanar image and an area of interest defined by a first geometric shape.

Applicants further note that IDASZAK is also entirely silent with regard to defining the first geometric shape by one or more coordinates and converting the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. Applicants submit, in particular, that the disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of converting with the hardware the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. The Examiner has failed to explain the basis for any equivalency between these features.

Applicants submit that IDASZAK also does not disclose or even suggest filling a handle with an initial area of interest (AOI) space associated with a first set of instructions using the hardware and defining a geometric shape associated with the initial AOI using the hardware (claim 22). Applicants note that the disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of, e.g., defining a geometric shape associated with the initial AOI using the hardware. As explained above, the system in IDASZAK merely converts previously prepared image data into nonplanar image data.

Nor can it be said that the nonplanar image produced by the disclosed conversion step in IDASZAK constitutes converting the initial AOI space to a second AOI space associated with a second set of instructions using the hardware and

accessing the second AOI space with the second set of instructions. The Examiner has failed to explain the equivalency between concerting image date to a nonplanar image and converting the initial AOI space to a second AOI space associated with a second set of instructions using the hardware and accessing the second AOI space with the second set of instructions.

Applicants additionally note that IDASZAK is entirely silent with regard to means for providing a first set of instructions which generate an area of information (AOI) and which is defined by a first geometric shape (claim 24). As explained above, the disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of providing a first set of instructions which generate an area of information (AOI) and which is defined by a first geometric shape. The system in IDASZAK merely converts previously prepared image data into nonplanar image data.

Nor can it be said that the nonplanar image produced by the disclosed conversion step in IDASZAK constitutes a means for converting the one or more coordinates associated with the first geometric shape to a second set of coordinates for use with a second set of instructions. Applicants submit, in particular, that the disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of a means for converting the one or more coordinates associated with the first geometric shape to a second set of coordinates for use with a second set of instructions. The Examiner has failed to explain the basis for any equivalency between these features.

The Examiner is respectfully directed to col. 5, lines 59-55 of IDASZAK, which

discloses the following:

> As shown in FIG. 1, a planar image graphics computer system 120, such as an OpenGL computer system, receives commands from a nonplanar image graphics computer system 110. The image data from the planar image graphics computer system 120 is then projected onto a nonplanar display such as dome 130 using nonplanar projection system 140.

It is clear from such language that the planar image data is converted to

nonplanar image data.  Such language clearly does not disclose or suggest using a first

set of instructions to generate an area of interest or information (AOI) defined by a first

geometric shape (claims 1 and 25).  Nor does this language disclose or suggest

converting the initial AOI space to a second AOI space associated with a second set of

instructions using the hardware and accessing the second AOI space with the second

set of instructions (claim 22).  Finally, this language clearly does not disclose or suggest

a means for providing a first set of instructions which generate an area of information

(AOI) and which is defined by a first geometric shape or a means for converting the one

or more coordinates associated with the first geometric shape to a second set of

coordinates for use with a second set of instructions (claim 24).

Accordingly, Applicants respectfully submit that independent claims 1, 22, 24 and

25 as well dependent claims 2-9, 11-13, 15, 16 and 23, which depend from claims 1 and

22 are allowable.

Applicants note, in particular, that IDASZAK also fails to disclose, or even

suggest:

(i)     that the new AOI associated with second set of instructions define a second geometric shape (claim 2).

(ii)    that the first geometric shape is a same shape as the second geometric shape (claim 3).

(iii)   that the first geometric shape is different than the second geometric shape (claim 4).

(iv)    that the first geometric shape is more constrained than the second geometric shape (claim 5).

(v)     that the first and the second geometric shape is one of a bounding box, a parallelogram, a rectangle and a polygon (claim 6).

(vi)    that the bounding box is more constrained than the parallelogram, the rectangle and the polygon (claim 7).

(vii)   that the one or more coordinates and the second set of coordinates are at least one point which defines the first geometric shape and the second geometric shape, respectively (claim 8).

(viii)  the step of rotating the second geometric shape by a predetermined amount compared to the first geometric shape (claim 9).

(ix)    the step of translating the second geometric shape by a predetermined amount compared to the first geometric shape (claim 11).

(x)     the step of scaling the second geometric shape by a predetermined amount compared to the first geometric shape (claim 12).

(xi)    that the step of scaling is performed in at least one of a vertical (Y) and horizontal direction (X) (claim 13).

(xii)   the step of orienting the second geometric shape differently than the first geometric shape (claim 15).

(xiii)  that the step of defining the first geometric shape includes the steps of determining whether the first geometric shape includes one of:
(i) at least three points;
(ii) a distinct starting point, fast end point and a slow end point;
(iii) a non-zero distance between a starting point and a fast end point; and
(iv) a non zero area (claim 16).

(xiv)   that the second AOI space has the same shape or is more constrained than the initial AOI space.

Accordingly, Applicants respectfully submit that the rejection under 35 U.S.C. § 102(b) should be withdrawn.

### 35 U.S.C. § 103 Rejections

Claim 10 was rejected under 35 U.S.C. § 103(a) for being allegedly unpatentable over IDASZAK alone and claim 14 was rejected under 35 U.S.C. § 103(a) for being allegedly unpatentable over IDASZAK in view of U.S. Patent No. 4,701,752 to WANG.

The Examiner acknowledges that IDASZAK lacks, among other things, rotating about an origin and mirroring points of the second geometric shape. However, the Examiner asserts that the former feature would be obvious to one of ordinary skill in the art, and that the latter is taught by WANG and that it would have been obvious to combine the teachings of these documents. Applicants respectfully submit that a *prima facie* case of obviousness has not been established as the applied references fail to teach each and every element of the claims.

Applicants submit that neither IDASZAK nor WANG disclose or suggest the combination of features recited in at least independent claim 1. Applicants also submit that no proper combination of these documents disclose or suggest the combination of features recited in at least claim 1.

As noted above, independent claim 1 recites, *inter alia,*

      providing to the hardware a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape;

      defining with the hardware the first geometric shape by one or more coordinates; and

      converting with the hardware the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions.

IDASZAK teaches a system and method for converting image data into nonplanar image data for displaying on a nonplanar display (see abstract). Applicants do not dispute, for example, that IDASZAK specifically discloses that the image data is used to produce transformed image data, subjecting the transformed image data to distortion correction to produce nonplanar image data, processing the transformed image data on a planar image graphics computer system, and displaying the processed planar image on a nonplanar display (see abstract). However, Applicants respectfully submit that, contrary to the instant invention, IDASZAK does not disclose or suggest at least the above-noted features of claim 1.

As explained above, IDASZAK is entirely silent with regard to providing a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape (claim 1). The disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of providing a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape. The system in IDASZAK merely converts previously prepared image data into nonplanar image data. Nor can it be said that the nonplanar image produced by the disclosed conversion step constitutes generating an area of interest (AOI) defined by a first geometric shape. The Examiner has failed to explain any

equivalency between a nonplanar image and an area of interest defined by a first geometric shape.

IDASZAK is also entirely silent with regard to defining the first geometric shape by one or more coordinates and converting the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. The disclosure in IDASZAK with regard to converting image data into nonplanar image data for displaying on a nonplanar display is not suggestive of converting with the hardware the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. The Examiner has failed to explain the basis for any equivalency between these features.

With regard to WANG, Applicants acknowledge that WANG relates a method of generating a mirror image of a graphic object (see abstract). Applicants do not dispute, for example, that WANG discloses that a graphic object 18 can be generated within a display edit window (see col. 3, lines 35-37) and that the object 18 can be selected and mirrored by the user using a computer system (see col. 3, line 50 to col. 4, line 9). However, Applicants respectfully submit that, contrary to the instant invention, WANG does not cure the deficiencies of IDASZAK and does not disclose or suggest at least the above-noted features of claim 1.

For example, WANG, like IDASZAK, is entirely silent with regard to providing a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape. The disclosure in WANG with regard to mirroring an object on a

computer system is not suggestive of providing a first set of instructions which generates an area of interest (AOI) defined by a first geometric shape. The system in WANG merely allows a user to create an object and then mirror it. Nor can it be said that the mirrored object produced by the disclosed system constitutes generating an area of interest (AOI) defined by a first geometric shape. The Examiner has failed to explain any equivalency between these features.

WANG, like IDASZAK, is also entirely silent with regard to defining the first geometric shape by one or more coordinates and converting the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. The disclosure in WANG with regard to generating an object and then mirroring it is simply not suggestive of converting with the hardware the one or more coordinates to a second set of coordinates for use with a second set of instructions different than the first set of instructions. The Examiner has failed to explain the basis for any equivalency between these features.

Thus, in addition to failing to disclose the combination of features recited in the claim 1, Applicants submit no proper combination of these documents discloses or suggests the combination of features recited in claim 1 or in the above-noted claims which depend from claim 1.

Applicants note, in particular, that no proper combination of IDASZAK and WANG discloses or suggests:

(i)      the step of rotating is performed about an origin (0,0) (claim 10).

(ii)    the step of mirroring points of the second geometric shape by a
predetermined amount compared to the first geometric shape about one of
a horizontal and vertical axis (claim 14).


Accordingly, Applicants respectfully submit that the above-noted rejections under

35 U.S.C. § 103(a) should be withdrawn.


## CONCLUSION

In view of the foregoing amendments and remarks, Applicants submit that all of

the claims are patentably distinct from the prior art of record and are in condition for

allowance. The Examiner is respectfully requested to pass the above application to

issue. The Examiner is invited to contact the undersigned at the telephone number

listed below, if needed.

Respectfully submitted,
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## AMENDMENT TO THE DRAWINGS

Please replace the ten drawings sheets showing Figs. 1 - 13e with the attached fourteen "Replacement Sheet" drawing sheets showing Figs. 1 - 13e.